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Region IX  
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**\*\* FILED \*\***  
**24 FEB 2021**  
**U.S. EPA - REGION IX**

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

In the matter of:	)	Docket No. FIFRA-09-2021-0031
	)	
Atekciti Corporation,	)	CONSENT AGREEMENT
	)	AND FINAL ORDER
Respondent.	)	pursuant to 40 C.F.R. §§ 22.13(b),
	)	22.18(b)(2), and 22.18(b)(3)

I. CONSENT AGREEMENT

The United States Environmental Protection Agency (“EPA”), Region IX, and Atekciti Corporation (“Respondent”) agree to settle this matter and consent to the entry of this Consent Agreement and Final Order (“CAFO”). This CAFO simultaneously initiates and concludes this proceeding in accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b).

A. AUTHORITY AND PARTIES

1. This is a civil administrative action brought pursuant to Section 14(a)(1) of the Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”), 7 U.S.C. § 136l(a)(1), for the assessment of a civil administrative penalty against Respondent for the failure to file reports required by FIFRA (e.g., a “Notices of Arrival” for an imported pesticide or device) in violation of Section 12(a)(2)(N) of FIFRA, 7 U.S.C. § 136j(a)(2)(N).

2. Complainant is the Manager of the Toxics Section in the Enforcement and Compliance Assurance Division, EPA Region IX, who has been duly delegated the authority to bring this action and to sign a consent agreement settling this action.

1           3. Respondent is Atekc City Corporation, a California corporation with headquarter offices  
2 located at 174 W. Lincoln Avenue, Unit 589, in Anaheim, California, 92805-2901.

3                           B. STATUTORY AND REGULATORY BASIS

4           4. The importation of pesticides and devices into the United States is governed by  
5 Sections 17(c) and (e) of FIFRA, 7 U.S.C. §§ 136o(c) and 136o(e), and the regulations  
6 promulgated thereunder by the Secretary of the Treasury in consultation with the Administrator  
7 of the EPA (the “Administrator”). These regulations are found at 19 C.F.R. Part 12.

8           5. 19 C.F.R. § 12.112 states, in part, that an importer desiring to import pesticides or  
9 devices into the United States shall submit to the Administrator a Notice of Arrival of Pesticides  
10 and Devices (Environmental Protection Agency Form 3540-1, or “Notice of Arrival”), prior to  
11 the arrival of the shipment in the United States. In the alternative, the importer or the importer’s  
12 agent may file an electronic equivalent to the Notice of Arrival. See also Section 17(c) of  
13 FIFRA, 7 U.S.C. § 136o(c).

14           6. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a “person” as any individual,  
15 partnership, association, corporation, or any organized group of persons whether incorporated or  
16 not.

17           7. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines a “pest” as any insect, rodent,  
18 nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus,  
19 bacteria, or other micro-organism (except viruses, bacteria, or other living micro-organisms on or  
20 in living man or other living animals) which the Administrator declares to be a pest under  
21 Section 25(c)(1) of FIFRA, 7 U.S.C. § 136w(c)(1).

22           8. Section 2(h) of FIFRA, 7 U.S.C. § 136(h), defines a “device,” in part, as any  
23 instrument or contrivance (other than a firearm) which is intended for trapping, destroying,  
24 repelling, or mitigating any pest or any other form of plant or animal life.

25           9. Section 12(a)(2)(N) of FIFRA, 7 U.S.C. § 136j(a)(2)(N), makes it unlawful for any  
26 person who is a registrant, wholesaler, dealer, retailer, or other distributor (*e.g.*, importer) to fail  
27 to file reports required by FIFRA.

28           10. The Administrator of EPA may assess a civil penalty against any registrant,

1 commercial applicator, wholesaler, dealer, retailer, or other distributor who violates any  
2 provision of FIFRA of up to \$20,528 for each offense that occurred after November 2, 2015  
3 where penalties are assessed on or after December 23, 2020. See Section 14(a)(1) of FIFRA, 7  
4 U.S.C. § 136l(a)(1); 40 C.F.R. Part 19; and Civil Monetary Penalty Inflation Adjustment Rule at  
5 85 Fed. Reg. 83818 (December 23, 2020).

### 6 C. ALLEGED VIOLATIONS

7 11. At all times relevant to this CAFO, Respondent was a corporation and therefore a  
8 “person” as that term is defined by Section 2(s) of FIFRA, 7 U.S.C. § 136(s), and as such is  
9 subject to FIFRA and the regulations promulgated thereunder.

10 12. At all times relevant to this CAFO, the label for the “Levoit LV-H126 Air Purifier”  
11 product bore claims that it was effective at mitigating mold spores and dust mites. The “Levoit  
12 LV-H126 Air Purifier” product is thus an instrument or contrivance (other than a firearm) which  
13 is intended for trapping, destroying, repelling, or mitigating any “pest,” as that term is defined by  
14 Section 2(t) of FIFRA, 7 U.S.C. § 136(t), and is thereby a “device,” as that term is defined in  
15 Section 2(h) of FIFRA, 7 U.S.C. § 136(h).

16 13. At all times relevant to this CAFO, the label for the “Levoit LV-H132 Air Purifier”  
17 product bore claims that it was effective at trapping mold spores and dust mites. The “Levoit  
18 LV-H132 Air Purifier” product is thus an instrument or contrivance (other than a firearm) which  
19 is intended for trapping, destroying, repelling, or mitigating any “pest,” as that term is defined by  
20 Section 2(t) of FIFRA, 7 U.S.C. § 136(t), and is thereby a “device,” as that term is defined in  
21 Section 2(h) of FIFRA, 7 U.S.C. § 136(h).

22 14. At all times relevant to this CAFO, the label for the “Vital 100 Air Purifier” product  
23 bore claims that it was effective at mitigating dust mites and airborne bacteria. The “Vital 100  
24 Air Purifier” product is thus an instrument or contrivance (other than a firearm) which is  
25 intended for trapping, destroying, repelling, or mitigating any “pest,” as that term is defined by  
26 Section 2(t) of FIFRA, 7 U.S.C. § 136(t), and is thereby a “device,” as that term is defined in  
27 Section 2(h) of FIFRA, 7 U.S.C. § 136(h).

28 15. At all times relevant to this CAFO, the label for the “Core 300 Air Purifier” product

1 bore claims that it was effective at trapping mold spores and dust mites and neutralizing bacteria.  
2 The “Core 300 Air Purifier” product is thus an instrument or contrivance (other than a firearm)  
3 which is intended for trapping, destroying, repelling, or mitigating any “pest,” as that term is  
4 defined by Section 2(t) of FIFRA, 7 U.S.C. § 136(t), and is thereby a “device,” as that term is  
5 defined in Section 2(h) of FIFRA, 7 U.S.C. § 136(h).

6 16. On or about October 19, 2020, Respondent failed to submit to the EPA a Notice of  
7 Arrival (or a digital alternative pursuant to the U.S. Department of Homeland Security, Bureau of  
8 Customs and Border Protection’s (“CBP”) Automated Commercial Environment (“ACE”)  
9 system) for the importation into the United States of the “Core 300 Air Purifier” device prior to  
10 the arrival of its shipment under Entry Number ACN-13094626 in the United States as required  
11 by Section 17(c) of FIFRA, 7 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

12 17. On or about October 19, 2020, Respondent failed to submit to the EPA a Notice of  
13 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
14 United States of the “Vital 100 Air Purifier” device prior to the arrival of its shipment under  
15 Entry Number ACN-13094659 in the United States as required by Section 17(c) of FIFRA, 7  
16 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

17 18. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
18 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
19 United States of the “Core 300 Air Purifier” device prior to the arrival of its shipment under  
20 Entry Number ACN-13095094 in the United States as required by Section 17(c) of FIFRA, 7  
21 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

22 19. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
23 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
24 United States of the “Core 300 Air Purifier” device prior to the arrival of its shipment under  
25 Entry Number ACN-13095102 in the United States as required by Section 17(c) of FIFRA, 7  
26 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

27 20. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
28 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the

1 United States of the “Core 300 Air Purifier” device prior to the arrival of its shipment under  
2 Entry Number ACN-13095110 in the United States as required by Section 17(c) of FIFRA, 7  
3 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

4 21. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
5 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
6 United States of the “Core 300 Air Purifier” device prior to the arrival of its shipment under  
7 Entry Number ACN-13095128 in the United States as required by Section 17(c) of FIFRA, 7  
8 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

9 22. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
10 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
11 United States of the “Levoit LV-H126 Air Purifier” and “Levoit LV-H132 Air Purifier” devices  
12 prior to the arrival of their shipment under Entry Number ACN-13095136 in the United States as  
13 required by Section 17(c) of FIFRA, 7 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

14 23. On or about October 18, 2020, Respondent failed to submit to the EPA a Notice of  
15 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
16 United States of the “Core 300 Air Purifier” device prior to the arrival of its shipment under  
17 Entry Number ACN-13095144 in the United States as required by Section 17(c) of FIFRA, 7  
18 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

19 24. On or about October 26, 2020, Respondent failed to submit to the EPA a Notice of  
20 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
21 United States of the “Levoit LV-H132 Air Purifier” device prior to the arrival of its shipment  
22 under Entry Number 8SY-00271577 in the United States as required by Section 17(c) of FIFRA,  
23 7 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

24 25. On or about October 26, 2020, Respondent failed to submit to the EPA a Notice of  
25 Arrival (or a digital alternative pursuant to CBP’s ACE system) for the importation into the  
26 United States of the “Levoit LV-H132 Air Purifier” device prior to the arrival of its shipment  
27 under Entry Number 8SY-00271460 in the United States as required by Section 17(c) of FIFRA,  
28 7 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

1           26. On or about October 14, 2020, Respondent failed to submit to the EPA a Notice of  
2 Arrival (or a digital alternative pursuant to CBP's ACE system) for the importation into the  
3 United States of the "Core 300 Air Purifier" device prior to the arrival of its shipment under  
4 Entry Number 8SY-00268078 in the United States as required by Section 17(c) of FIFRA, 7  
5 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

6           27. On or about October 12, 2020, Respondent failed to submit to the EPA a Notice of  
7 Arrival (or a digital alternative pursuant to CBP's ACE system) for the importation into the  
8 United States of the "Core 300 Air Purifier" device prior to the arrival of its shipment under  
9 Entry Number ACN-13089626 in the United States as required by Section 17(c) of FIFRA, 7  
10 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

11           28. On or about October 12, 2020, Respondent failed to submit to the EPA a Notice of  
12 Arrival (or a digital alternative pursuant to CBP's ACE system) for the importation into the  
13 United States of the "Vital 100 Air Purifier" and "Core 300 Air Purifier" devices prior to the  
14 arrival of their shipment under Entry Number ACN-13089634 in the United States as required by  
15 Section 17(c) of FIFRA, 7 U.S.C. § 136o(c), and 19 C.F.R. § 12.112.

16           29. By failing to submit to the EPA a Notice of Arrival (or a digital alternative pursuant  
17 to CBP's ACE system) for the importation into the United States of the "Levoit LV-H126 Air  
18 Purifier," "Levoit LV-H132 Air Purifier," "Vital 100 Air Purifier," and "Core 300 Air Purifier"  
19 devices prior to the arrival of each of the aforementioned 13 shipments in the United States  
20 between October 12, 2020, and October 26, 2020, Respondent failed to file a report required by  
21 FIFRA in each instance and thus committed 13 violations of Section 12(a)(2)(N) of FIFRA, 7  
22 U.S.C. § 136j(a)(2)(N).

#### 23                                   D. RESPONDENT'S ADMISSIONS

24           30. In accordance with 40 C.F.R. § 22.18(b)(2) and for the purpose of this proceeding,  
25 Respondent: (i) admits that EPA has jurisdiction over the subject matter of this CAFO and over  
26 Respondent; (ii) neither admits nor denies the specific factual allegations contained in Section  
27 I.C of this CAFO; (iii) consents to any and all conditions specified in this CAFO and to the  
28 assessment of the civil administrative penalty under Section I.E of this CAFO; (iv) waives any

1 right to contest the allegations contained in this CAFO; and (v) waives the right to appeal the  
2 proposed Final Order contained in this CAFO.

3 E. CIVIL ADMINISTRATIVE PENALTY

4 31. In full and final settlement of the violations specifically alleged in Section I.C of this  
5 CAFO, Respondent shall pay a civil administrative penalty of ONE HUNDRED AND TEN  
6 THOUSAND, SIX HUNDRED, AND FIFTY-SIX DOLLARS (\$110,656). Respondent shall  
7 pay this civil penalty within thirty (30) days of the effective date of this CAFO. The civil penalty  
8 shall be paid by remitting a certified or cashier's check, including the name and docket number  
9 of this case, for the amount, payable to "Treasurer, United States of America," (or be paid by one  
10 of the other methods listed below) and sent as follows:

11 Regular Mail:

12 U.S. Environmental Protection Agency  
13 Fines and Penalties  
14 Cincinnati Finance Center  
15 PO Box 979077  
16 St. Louis, MO 63197-9000

17 Wire Transfers:

18 Wire transfers must be sent directly to the Federal Reserve Bank in New  
19 York City with the following information:  
20 Federal Reserve Bank of New York  
21 ABA = 021030004  
22 Account = 68010727  
23 SWIFT address = FRNYUS33  
24 33 Liberty Street  
25 New York, NY 10045  
26 Beneficiary = U.S. Environmental Protection Agency

27 Certified or Overnight Mail:

28 U.S. Bank  
1005 Convention Plaza  
Mail Station SL-MO-C2GL  
ATTN Box 979077  
St. Louis, MO 63101

ACH (also known as Remittance Express or REX):

Automated Clearinghouse (ACH) payments to EPA can be made through  
the U.S. Treasury using the following information:

U.S. Treasury REX/Cashlink ACH Receiver  
ABA = 051036706



Account = 31006, Environmental Protection Agency  
CTX Format Transaction Code 22 – checking

Physical location of U.S. Treasury facility:

5700 Rivertech Court  
Riverdale, MD 20737

Remittance Express (REX) = (866) 234-5681

On Line Payment:

This payment option can be accessed from the information below:

www.pay.gov  
Enter “SFO 1.1” in the search field  
Open form and complete required fields

If clarification regarding a particular method of payment remittance is needed, contact the EPA’s Cincinnati Finance Center at (513) 487-2091.

A copy of each check, or notification that the payment has been made by one of the other methods listed above, including proof of the date payment was made, shall be sent with a transmittal letter, indicating Respondent’s name, the case title, and docket number, to the following regular mail or email addresses:

Regional Hearing Clerk  
Office of Regional Counsel (ORC-1)  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
R9HearingClerk@epa.gov

Brandon Boatman  
Toxics Section  
Enforcement and Compliance Assurance Division (ENF-2-3)  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
boatman.brandon@epa.gov

32. Respondent shall not use payment of any penalty under this CAFO as a tax deduction from Respondent’s federal, state, or local taxes, nor shall Respondent allow any other person to use such payment as a tax deduction.

33. If Respondent fails to pay the assessed civil administrative penalty of ONE HUNDRED AND TEN THOUSAND, SIX HUNDRED, AND FIFTY-SIX DOLLARS



1 (\$110,656), as identified in Paragraph 34, by the deadline specified in that Paragraph, then  
2 Respondent shall pay a stipulated penalty to EPA of FIVE HUNDRED DOLLARS (\$500) per  
3 day in addition to the assessed penalty. Stipulated penalties shall accrue until such time as the  
4 assessed penalty and all accrued stipulated penalties are paid and shall become due and payable  
5 upon EPA's written request. Failure to pay the civil administrative penalty specified in  
6 Paragraph 34 by the deadline specified in that Paragraph may also lead to any or all of the  
7 following actions:

8 (1) EPA may refer the debt to a credit reporting agency, a collection  
9 agency, or to the Department of Justice for filing of a collection action in the appropriate United  
10 States District Court. 40 C.F.R. §§ 13.13, 13.14 and 13.33. The validity, amount, and  
11 appropriateness of the assessed penalty or of this CAFO is not subject to review in any such  
12 collection proceeding.

13 (2) The U.S. Government may collect the debt by administrative offset  
14 (*i.e.*, the withholding of money payable by the United States to, or held by the United States for, a  
15 person to satisfy the debt the person owes the U.S. Government), which includes, but is not  
16 limited to, referral to the Internal Revenue Service for offset against income tax refunds. 40  
17 C.F.R. §§ 13(C) and 13(H).

18 (3) Pursuant to 40 C.F.R. § 13.17, EPA may either: (i) suspend or revoke  
19 Respondent's licenses or other privileges, or (ii) suspend or disqualify Respondent from doing  
20 business with EPA or engaging in programs EPA sponsors or funds.

21 (4) Pursuant to 31 U.S.C. § 3701 *et seq.* and 40 C.F.R. Part 13, the U.S.  
22 Government may assess interest, administrative handling charges, and nonpayment penalties  
23 against the outstanding amount that Respondent owes to EPA for Respondent's failure to pay the  
24 civil administrative penalty specified in Paragraph 34 by the deadline specified in that Paragraph.

25 (a) Interest. Pursuant to 31 U.S.C. § 3717 and 40 C.F.R.  
26 §13.11(a)(1), any unpaid portion of the assessed penalty shall bear interest at the rate established  
27 according to 26 U.S.C. § 6621(a)(2) from the effective date of this CAFO, provided, however,  
28

1 that no interest shall be payable on any portion of the assessed penalty that is paid within thirty  
2 (30) days of the effective date of this CAFO.

3 (b) Administrative Handling Charges. Pursuant to 31 U.S.C.  
4 Section 3717(e)(1) and 40 C.F.R. § 13.11(b), Respondent shall pay a monthly handling charge,  
5 based on either actual or average cost incurred (including both direct and indirect costs), for  
6 every month in which any portion of the assessed penalty is more than thirty (30) days past due.

7 (c) Nonpayment Penalties. Pursuant to 31 U.S.C. § 3717(e)(2)  
8 and 40 C.F.R. § 13.11(c), a monthly penalty charge, not to exceed six percent (6%) annually,  
9 may be assessed on all debts more than ninety (90) days delinquent.

#### 10 F. CERTIFICATION OF COMPLIANCE

11 34. In executing this CAFO, Respondent certifies that the information it has supplied  
12 concerning this matter was at the time of submission, and is at the time of signature to this  
13 CAFO, truthful, accurate, and complete; and that Respondent has corrected the violations alleged  
14 in Section I.C of this CAFO. Under 18 U.S.C. § 1001, submitting false or misleading  
15 information can result in significant penalties, including the possibility of fines and  
16 imprisonment for knowing submission of such information.

#### 17 G. RETENTION OF RIGHTS

18 35. In accordance with 40 C.F.R. § 22.18(c), this CAFO only resolves Respondent's  
19 liabilities for federal civil penalties for the violations and facts specifically alleged in Section I.C  
20 of this CAFO. Nothing in this CAFO is intended to or shall be construed to resolve: (i) any civil  
21 liability for violations of any provision of any federal, state, or local law, statute, regulation, rule,  
22 ordinance, or permit not specifically alleged in Section I.C of this CAFO; or (ii) any criminal  
23 liability. EPA specifically reserves any and all authorities, rights, and remedies available to it  
24 (including, but not limited to, injunctive or other equitable relief or criminal sanctions) to address  
25 any violation of this CAFO or any violation not specifically alleged in Section I.C of this CAFO.

26 36. This CAFO does not exempt, relieve, modify, or affect in any way Respondent's  
27 duties to comply with all applicable federal, state, and local laws, regulations, rules, ordinances,  
28 and permits.

H. ATTORNEYS' FEES AND COSTS

37. Each party shall bear its own attorneys' fees, costs, and disbursements incurred in this proceeding.

I. EFFECTIVE DATE

38. In accordance with 40 C.F.R. §§ 22.18(b)(3) and 22.31(b), this CAFO shall be effective on the date that the Final Order contained in this CAFO, having been approved and issued by either the Regional Judicial Officer or Regional Administrator, is filed.

J. BINDING EFFECT

39. The undersigned representative of Complainant and the undersigned representative of Respondent each certifies that he or she is fully authorized to enter into the terms and conditions of this CAFO and to bind the party he or she represents to this CAFO.

40. The provisions of this CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assigns.

FOR RESPONDENT ATEKCITY CORPORATION:

2/11/21  
DATE

  
ALEXANDER TANG  
Corporate Counsel  
Atekcitey Corporation  
174 W. Lincoln Ave., Unit 589  
Anaheim, CA 92805-2901

FOR COMPLAINANT EPA:

2/11/21  
DATE

MATTHEW  
SALAZAR  
MATT SALAZAR, P.E.  
Manager, Toxics Section  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency, Region IX

Digitally signed by MATTHEW SALAZAR  
Date: 2021.02.11 10:52:32 -08'00'

II. FINAL ORDER

EPA and Atekc City Corporation having entered into the foregoing Consent Agreement,  
IT IS HEREBY ORDERED that this CAFO (Docket No. FIFRA-09-2021-0031) be entered,  
and Respondent shall pay a civil administrative penalty in the amount of ONE HUNDRED  
AND TEN THOUSAND, SIX HUNDRED, AND FIFTY-SIX DOLLARS  
(\$110,656) and comply with the terms and conditions set forth in the Consent Agreement.

STEVEN  
JAWGIEL

Digitally signed by STEVEN  
JAWGIEL

Date: 2021.02.24 10:36:10  
-08'00'

\_\_\_\_\_  
DATE

\_\_\_\_\_  
STEVEN JAWGIEL  
Regional Judicial Officer  
U.S. Environmental Protection Agency, Region IX

## **CERTIFICATE OF SERVICE**

This is to certify that the original of the fully executed Consent Agreement and Final Order, **(Docket No FIFRA-09-2021-0031)** was filed with the Regional Hearing Clerk, and a true and correct copy of the same was sent to the following parties:

For RESPONDENT, via Electronic Mail:

Alexander Tang  
Corporate Counsel  
Atekcite Corporation  
174 W. Lincoln Avenue, Unit 589  
Anaheim, California 92805-2901  
email: alex.tang@atekcite.com

Keith Matthews  
Attorney at Law  
Wiley Rein LLP  
1776 K Street NW  
Washington, DC 20006  
email: kmatthews@wiley.law

For COMPLAINANT, via Electronic Mail:

Edgar P. Coral  
Assistant Regional Counsel  
U.S. EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
email: coral.edgar@epa.gov

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Regional Hearing Clerk  
U.S. EPA, Region IX

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Date